

Exhibit "24"

From: Mini Rodriguez [/O=TEVA/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=HERRODRI]
Sent: 12/2/2015 11:05:20 AM
To: Christopher Swartz [christopher.swartz@tevapharm.com]
Subject: FW: Planned meeting next Thursday
Importance: High
Sensitivity: Company Confidential

FYI

From: Tara Flagg
Sent: Wednesday, December 02, 2015 10:04 AM
To: Jennifer Flaisher; Thomas McDonough
Cc: Mini Rodriguez; Pamela Daknis
Subject: FW: Planned meeting next Thursday
Importance: High

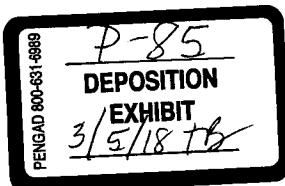
Redacted

Best regards,



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Have a question? AskHR





OUR PURPOSE & VALUES

From: Tara Flagg
Sent: Wednesday, December 02, 2015 10:04 AM
To: Stephen Middlebrooks
Subject: RE: Planned meeting next Thursday
Importance: High

Steve,

If you want to provide me with an opportunity to thoroughly investigate the serious allegations you have raised then yes, you are required to participate as it is necessary that I speak with you in order to conduct a valid investigation. If you are not concerned about the validity of my investigation then no, you are not required to participate.

Please understand your decision not to participate means that you are hindering the investigation and therefore removing my ability to conduct a fair and impartial assessment and you are not providing Teva an opportunity to truly address your concerns.

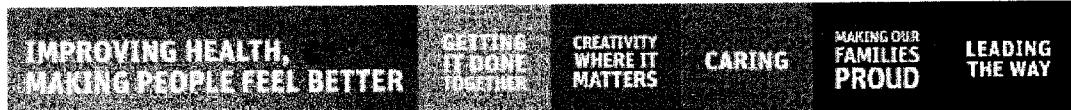
Please advise how you wish to proceed.

Best regards,



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Have a question? [AskHR](#)



OUR PURPOSE & VALUES

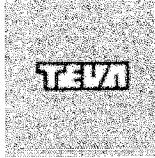
From: Stephen Middlebrooks
Sent: Tuesday, December 01, 2015 6:03 PM
To: Tara Flagg
Cc: Stephen Middlebrooks
Subject: RE: Planned meeting next Thursday

Tara,

Thank you for your response. However, while you have indicated that the expectation is that I would participate in this meeting, I am still unclear as to whether I am required to participate. Please let me know if I am required to participate in the meeting.

Regards,

Steve

 Stephen Middlebrooks Senior Director, North American Facility Management

Tel: 215-591-8722 Cell: 610-909-0544 Fax: 215-591-8804

Stephen.Middlebrooks@tevapharm.com sip:Stephen.Middlebrooks@tevapharm.com www.tevapharm.com



OUR PURPOSE & VALUES

Teva Pharmaceuticals

PO Box 1090

North Wales, PA 19454-1090

From: Tara Flagg
Sent: Monday, November 30, 2015 1:55 PM
To: Stephen Middlebrooks
Subject: RE: Planned meeting next Thursday

Hi Steve,

Please see my response below.

Best regards,



AskHR. AskHR is here to provide assistance related to matters in Human Resources including HR Policies, Employee Programs, Benefits, Careers, Leadership & Development, Payroll and more!

Have a question? [AskHR](#)



From: Stephen Middlebrooks
Sent: Wednesday, November 25, 2015 12:23 PM
To: Tara Flagg
Subject: Planned meeting next Thursday

Tara,

In preparation for our meeting next Thursday, can you please supply me with the following information:

1) What is the purpose of this meeting? The meeting is in response to the concerns you recently shared with Jen Flaisher (per your meeting with her and as discussed in her 11/19 email and my 11/20 response to your questions).

-----Original Appointment-----

From: Tara Flagg
Sent: Friday, November 20, 2015 3:40 PM
To: Stephen Middlebrooks
Subject: Introduction & Discussion
When: Thursday, December 03, 2015 2:00 PM-4:00 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Steve's Office

Hi Steve,

Thank you for reaching out to me. While I understand the need to delay our meeting, I want you to know the concerns you raised are very disturbing and therefore speaking with you is my top priority. If your schedule changes and you have any availability before 12/3/15 please immediately let me know and I will make the necessary adjustments on my end.

At this time I do not have a request for materials or a list of topics to discuss. The information provided to me was high level and my hope is that our conversation will be very detailed and granular.

Steve, Teva neither authorizes nor tolerates any form of harassment, discrimination or retaliation. Furthermore anyone, regardless of position or title, that engages in such conduct will be subject to discipline up to and including termination.

Regards,

Tara Flagg

2) Am I required to participate in this meeting? Since you raised the concerns the expectation is that you would participate as it is nearly impossible for me to conduct an investigation without speaking to you.

3) Will I be provided a complete, unedited copy of any reports related to the meeting and any related investigation? No, I cannot provide you with a complete, unedited copy of my final report as doing so would reveal the identity of those who participated in the investigation (i.e. individuals I interviewed including management and your direct reports) as well as their statements and information they share (i.e. your direct reports making statements about you).

4) Will anyone else be present during the meeting? No

5) Will the meeting be recorded? No, I do not record my meetings nor will I give permission for my meetings to be recorded.

 Stephen Middlebrooks Senior Director, North American Facility Management

Tel: 215-591-8722 Cell: 610-909-0544 Fax: 215-591-8804

Stephen.Middlebrooks@tevapharm.com <sip:Stephen.Middlebrooks@tevapharm.com> www.tevapharm.com

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MAKING PEOPLE FEEL BETTER**

**GETTING
IT DONE
TOGETHER**

**CREATIVITY
WHERE IT
MATTERS**

CARING

**MAKING OUR
FAMILIES
PROUD**

**LEADING
THE WAY**

OUR PURPOSE & VALUES

Teva Pharmaceuticals

PO Box 1090

North Wales, PA 19454-1090

Exhibit "25"

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

STEPHEN MIDDLEBROOKS : CIVIL ACTION NO. 17-0412
Plaintiff, :
v. :
TEVA PHARMACEUTICALS USA, INC.; :
TEVA PHARMACEUTICAL :
INDUSTRIES LIMITED :
Defendants. :
:

**DEFENDANT TEVA PHARMACEUTICALS USA INC.'S FIRST AMENDED
ANSWERS TO PLAINTIFF'S FIRST INTERROGATORIES**

Defendant, Teva USA Pharmaceuticals USA, Inc. ("Teva USA"), by and through its attorneys, provides these First Amended Answers to the First Set of Interrogatories ("Interrogatories") propounded by Plaintiff, Stephen Middlebrooks ("Middlebrooks" or "Plaintiff"), as follows, and Defendant Teva Pharmaceutical Industries Ltd. ("Teva Israel") by and through its attorneys, hereby adopts Teva USA's Answers to the First Set of Interrogatories, pending the Court's ruling on Teva Israel's Motion to Dismiss the Second Amended Complaint Against Teva Israel.¹

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

1. Defendants object to Plaintiff's Interrogatories to the extent that the Interrogatories seek information and documents that are irrelevant in whole or in part to the claims set forth in Plaintiff's Second Amended Complaint

¹ Teva Israel asserts that there is no subject matter jurisdiction over it in this matter for the reasons set forth in its Motion to Dismiss. Adoption of Teva USA's First Amended Answers to Plaintiffs' First Interrogatories does not constitute an admission that Teva Israel is a proper party to this action.



(“Complaint”) and to issues and defenses presented by Defendants’ Answer and Affirmative Defenses to Plaintiff’s Second Amended Complaint (“Answer”).

2. Defendants object to Plaintiff’s Interrogatories to the extent that the Interrogatories are not reasonably calculated to lead to the discovery of admissible evidence.
3. Defendants object to Plaintiff’s Interrogatories to the extent that the Interrogatories seek information and documents that exceed the permissible scope of discovery under the Federal Rules of Civil Procedure.
4. Defendants object to the “Definitions and Instructions” section of the Interrogatories to the extent that the Instructions seek to impose on Defendants discovery obligations beyond those set forth in the Federal Rules of Civil Procedure or any case management orders that may be entered in this action.
5. Teva USA, by providing responses to these requests, and Teva Israel, by adopting Teva USA’s responses, do not waive, but rather preserve:
 - a. Objections as to competency, relevancy, materiality and admissibility;
 - b. Rights to object to the use of any of the responses herein in any subsequent proceedings, including the trial of this or any other action;
 - c. Objections as to vagueness, over breadth and ambiguity; and
 - d. Rights to object to any further discovery requests in this action.
6. Defendants object to providing any information and/or documents concerning events occurring outside the applicable statute of limitations.
7. Defendants object to each Interrogatory that:

- a. Could be construed to require production of voluminous quantities of documents and/or information because any such discovery request is unduly burdensome and oppressive;
 - b. Could be construed to require production of information and/or documents protected from disclosure by the attorney client privilege, the work product doctrine or any other applicable privilege or protection;
 - c. Is not relevant to the subject matter of the pending action and is not reasonably calculated to lead to the discovery of admissible evidence; or
 - d. Renders the Interrogatory overly broad or unreasonably burdensome or attempts to create an obligation to respond that exceeds the requirements of the Federal Rules of Civil Procedure.
8. Defendants object to producing any information or documents requested that are generally made available to the public or are public documents.
9. Defendants object to these Interrogatories to the extent they seek confidential and proprietary business information and information that is confidential as to an individual, except for Plaintiff, including personnel information for Teva USA's and Teva Israel's other current and/or former employees. Non objectionable confidential personnel information for other current and/or former employees will only be produced in accordance with applicable law and subject to an appropriate Confidentiality Stipulation and/or Protective Order, a draft of which will be provided to Plaintiff's counsel for review.
10. Defendants object to Plaintiff's Interrogatories to the extent they could be interpreted to require the production of or reference to electronic

communications/electronically stored information (ESI), including emails, to the extent such requests are overly broad, unduly burdensome, and disproportional to the needs of the case, and seek information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

11. Defendants incorporate the above objections into each of its responses to Plaintiff's Interrogatories, as if fully set forth at length therein.
12. Whenever the text of a response refers to the text of another response, such reference shall be deemed and is intended to incorporate the text of the referenced responses as though that response were set forth in full.
13. Defendants do not waive, nor do they intend to waive, the attorney client privilege or protection of the work product doctrine, nor should any such waiver be inferred from the fact that Teva USA has responded to any of the Interrogatories herein or that Teva Israel has adopted any of the Responses.
14. Teva USA has retained herein the original numbering of Plaintiff's Interrogatories.
15. Defendants reserve the rights to specify an inspection of business documents under the Federal Rules of Civil Procedure.
16. Defendants reserve the right to amend or supplement these First Amended Answers to Plaintiff's Interrogatories.

INTERROGATORIES

1. State with specificity each and every legitimate, non-discriminatory reason as to why Plaintiff was terminated in February 2016, and the complete factual bases for the same.

ANSWER: Plaintiff was terminated because of his poor performance as Senior Director of North American Facilities Management, his inability or unwillingness to

demonstrate the high level leadership and management skills necessary to succeed in this new position and his failure to meet the terms of his PIP despite it being extended. By way of further response, see Teva USA's Position Statement.

2. Identify each individual who was involved in the decision to terminate Plaintiff in February 2016, and describe each individual's role and input into that decision.

ANSWER: Nir Aharoni, Christopher Swartz, and Jennifer Flaisher. The decision was made by consensus in consultation with Teva USA's in-house counsel Thomas McDonough.

3. State with specificity each and every legitimate, non-discriminatory reason as to why Defendants placed Plaintiff on a Performance Improvement Plan in October 2015.

ANSWER: Plaintiff was placed on a PIP by Teva USA because of deficiencies with regard to his performance in his role as Senior Director of North American Facilities Management. These deficiencies are documented in his PIP (TEVA (SM) 000702-705) and 2014 performance review (TEVA (SM) 000666-680) and in communications regarding Plaintiff's performance, including but not limited to TEVA (SM) 000391, and may be further explored at depositions in this matter.

4. Identify each individual who was involved in the decision to place Plaintiff on a Performance Improvement Plan in October 2015, and describe each individual's role and input into that decision.

ANSWER: Nir Aharoni, Jennifer Flaisher, Mini Rodriguez, and Ilanit Shtrouchler. It was determined by Teva USA Human Resources in conjunction with Mr. Aharoni and Ms. Shtrouchler that Plaintiff should be placed on a PIP.

5. Identify, by name, date of birth, national origin, dates of employment, title, and direct supervisor, each and every employee of (a) Defendants' North American Facilities Management organization; (b) Defendants' Global Facilities Management organization; and, (c) Defendant Teva USA Pharmaceuticals USA, Inc., who has been terminated since January 1, 2012 through the present time, and identify the reason(s) and date(s) for the action taken. Your answer should include last known contact information for each person identified.

ANSWER: Teva USA objects to the request as overly broad, unduly burdensome and seeking information that is irrelevant and not reasonably calculated to lead to the

discovery of admissible evidence. Teva USA further objects to this request to the extent it seeks information that is confidential as to an individual, except for Plaintiff, including personnel information for former employees of Teva USA and related companies. Non-objectionable confidential personnel information for former employees will only be produced in accordance with applicable law and subject to an appropriate Confidentiality Stipulation and/or Protective Order. Subject to the foregoing objections and pursuant to the executed Stipulation of Confidentiality in this matter, Teva USA has produced a list of employees who have been terminated from Plaintiff's group (NAFM) and Nir Aharoni's group (GFM) from January 1, 2014 to the present, including the employees' name, age, position, department, dates of employment, country and reason for termination, at CONFIDENTIAL TEVA(SM) 002460.

6. State with specificity each and every instance where Defendants allege that Plaintiff was in any way deficient in connection with the performance of his duties while employed with Defendants.

ANSWER: Teva USA objects to the request to the extent that it is overly broad, unduly burdensome and seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing objections, see the enclosed PIP (TEVA (SM) 000703-705) and other documentation regarding Plaintiff's performance including but not limited to Plaintiff's 2014 performance review (TEVA (SM) 000667-680) and PIP summary (TEVA (SM) 00713-718).

7. State with specificity, as of February 1, 2016, the compensation (including, but not limited to, salary, bonuses, and stock options) and benefits (including, but not limited to, medical insurance and retirement benefits) earned and/or received by Plaintiff and how the same were calculated.

ANSWER: Plaintiff's annual salary upon separation was \$192,011.88 (effective March 2, 2015). He had a 30% target bonus and received a bonus in the amount of \$56,371.75 on March 13, 2015. As he was not active upon bonus payout in 2016, he did not receive one. By way of further response, see enclosed documents regarding Plaintiff's compensation and benefits among TEVA (SM) 000082-161.

8. Describe in detail the value (both by cost to the company, as well as the replacement value to Plaintiff) of each and every benefit that Plaintiff had as part of his employment with Defendants as of February 1, 2016, including, but not limited to, health insurance; dental

insurance; life insurance; disability insurance; vacation; retirement benefits; pension plan; and, sick leave/vacation policies.

ANSWER: Teva USA objects to the request to the extent that it is overly broad, unduly burdensome and seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects to this request as vague and ambiguous as the phrase "replacement value to the plaintiff" is vague and undefined. Defendant further objects to this request as misleading as Plaintiff was not employed by Defendants; he was employed by Defendant Teva USA only. Subject to the foregoing objections, see enclosed documents regarding Plaintiff's benefits at TEVA (SM) 000082-111 and 146-160. By way of further response, per Teva Pharmaceuticals Retirement Savings Plan employees would receive matching and defined contributions in accordance with the Plan terms and applicable law; Plaintiff received a 2015 defined contribution on March 9, 2016 in the amount of \$10,012.49 and his 2015 true up in the amount of \$1,764.35 on April 14, 2016.

9. Identify by name, job title, direct supervisor, date of birth, national origin, date of hire, and, if applicable, date of termination and reason(s) for termination, each and every person who, following Plaintiff's termination, performed any of the work and/or duties previously performed by Plaintiff prior to his termination.

ANSWER: Senior Director Dan Ramirez who was already working as the Latin America Facilities Management Region Director assumed Plaintiff's duties after Plaintiff's termination, and after the decision was made to combine the Latin America and North America Regions, Mr. Ramirez became the Americas Facilities Management Region Director in or around June 2016. Mr. Ramirez is American, was born on [REDACTED] 1978 and is supervised by Nir Aharoni. Mr. Ramirez was hired by Teva USA on or about August 3, 2015.

Dated: November 10, 2017

STEVENS & LEE

By: /s/ Larry J. Rappoport
Larry J. Rappoport, Esquire
Attorney ID No. 26922
1818 Market Street
29th Floor
Philadelphia, PA 19103
Phone: (215) 496-3839

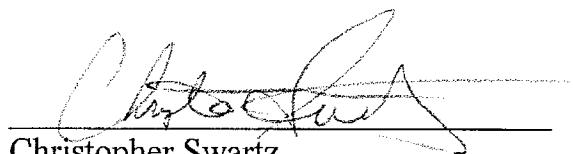
Email: ljr@stevenslee.com
Jennifer A. Ermilio, Esquire
Attorney ID No. 82062
620 Freedom Business Center, Suite 200
King of Prussia, PA 19406
Phone: (610) 205-6044
Email: jae@stevenslee.com

Attorneys for Defendants

VERIFICATION

I, Christopher Swartz, verify that I am a Senior Director, Human Resources at Teva Pharmaceuticals USA, Inc., a defendant in this matter; that I have read the foregoing First Amended Answers to Plaintiff's First Interrogatories; and that the facts stated in those Answers are true and correct to the best of my knowledge, information, and belief. I understand that this verification is executed subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

Dated: November 1, 2017



Christopher Swartz

CERTIFICATE OF SERVICE

I, Jennifer A. Ermilio, certify that on this date, I served a true and correct copy of the foregoing Defendant Teva Pharmaceuticals USA Inc.'s First Amended Answers to Plaintiff's First Interrogatories, adopted by Defendant Teva Pharmaceutical Industries Ltd., upon the following counsel of record, by emailing and depositing the same in the United States mail, postage prepaid, addressed as follows:

Stephen Console
Caren N. Gurmankin
Console Mattiacci Law LLC
1525 Locust St., 9th Floor
Philadelphia, PA 19102
Console@consolelaw.com
Gurmankin@consolelaw.com

/s/ Jennifer A. Ermilio

Date: November 10, 2017

Exhibit "26"

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA

STEPHEN MIDDLEBROOKS	:	CIVIL ACTION NO. 17-0412
Plaintiff,	:	
	:	
V.	:	
	:	
TEVA PHARMACEUTICALS USA, INC.;	:	
TEVA PHARMACEUTICAL	:	
INDUSTRIES LIMITED	:	
	:	
Defendants.	:	
	:	

**DEFENDANTS' SECOND AMENDED ANSWERS
TO PLAINTIFF'S FIRST INTERROGATORIES**

Defendants, Teva USA Pharmaceuticals USA, Inc. ("Teva USA") and Teva Pharmaceutical Industries, Ltd. ("Teva Israel") (collectively "Defendants"), by and through their attorneys, provide these Second Amended Answers to the First Set of Interrogatories ("Interrogatories") propounded by Plaintiff, Stephen Middlebrooks ("Middlebrooks" or "Plaintiff"), as follows:

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

1. Defendants object to Plaintiff's Interrogatories to the extent that the Interrogatories seek information and documents that are irrelevant in whole or in part to the claims set forth in Plaintiff's Second Amended Complaint ("Complaint") and to issues and defenses presented by Defendants' Answer and Affirmative Defenses to Plaintiff's Second Amended Complaint ("Answer").
2. Defendants object to Plaintiff's Interrogatories to the extent that the Interrogatories seek documents and information that are disproportional to the needs of the case.

3. Defendants object to Plaintiff's Interrogatories to the extent that the Interrogatories seek information and documents that exceed the permissible scope of discovery under the Federal Rules of Civil Procedure.
4. Defendants object to the "Definitions and Instructions" section of the Interrogatories to the extent that the Instructions seek to impose on Defendants discovery obligations beyond those set forth in the Federal Rules of Civil Procedure or any case management orders that may be entered in this action.
5. Defendants, by providing responses to these requests, do not waive, but rather preserve:
 - a. Objections as to competency, relevancy, materiality and admissibility;
 - b. Rights to object to the use of any of the responses herein in any subsequent proceedings, including the trial of this or any other action;
 - c. Objections as to vagueness, over breadth and ambiguity; and
 - d. Rights to object to any further discovery requests in this action.
6. Defendants object to providing any information and/or documents concerning events occurring outside the applicable statute of limitations.
7. Defendants object to each Interrogatory that:
 - a. Could be construed to require production of voluminous quantities of documents and/or information because any such discovery request is unduly burdensome and oppressive;
 - b. Could be construed to require production of information and/or documents protected from disclosure by the attorney client privilege, the work product doctrine or any other applicable privilege or protection;

- c. Is not relevant to the subject matter of the pending action and disproportional to the needs of the case; or
- d. Renders the Interrogatory overly broad or unreasonably burdensome or attempts to create an obligation to respond that exceeds the requirements of the Federal Rules of Civil Procedure.

8. Defendants object to producing any information or documents requested that are generally made available to the public or are public documents.
9. Defendants object to these Interrogatories to the extent they seek confidential and proprietary business information and information that is confidential as to an individual, except for Plaintiff, including personnel information for Teva USA's and Teva Israel's other current and/or former employees. Non objectionable confidential personnel information for other current and/or former employees will only be produced in accordance with applicable law and subject to the Stipulation of Confidentiality executed by the parties in this matter.
10. Defendants object to Plaintiff's Interrogatories to the extent they could be interpreted to require the production of or reference to electronic communications/electronically stored information (ESI), including emails, to the extent such requests are overly broad, unduly burdensome, and disproportional to the needs of the case, and seek information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.
11. Defendants incorporate the above objections into each of its responses to Plaintiff's Interrogatories, as if fully set forth at length therein.

12. Whenever the text of a response refers to the text of another response, such reference shall be deemed and is intended to incorporate the text of the referenced responses as though that response were set forth in full.
13. Defendants do not waive, nor do they intend to waive, the attorney client privilege or protection of the work product doctrine, nor should any such waiver be inferred from the fact that Defendants have responded to any of the Interrogatories herein.
14. Defendants have retained herein the original numbering of Plaintiff's Interrogatories.
15. Defendants reserve the rights to specify an inspection of business documents under the Federal Rules of Civil Procedure.
16. Defendants reserve the right to amend or supplement these Second Amended Answers to Plaintiff's Interrogatories.

INTERROGATORIES

1. State with specificity each and every legitimate, non-discriminatory reason as to why Plaintiff was terminated in February 2016, and the complete factual bases for the same.

ANSWER: Plaintiff was terminated by Teva USA because of his poor performance as Senior Director of North American Facilities Management, his inability or unwillingness to demonstrate the high level leadership and management skills necessary to succeed in this new position and his failure to meet the terms of his PIP despite it being extended. By way of further response, see Teva USA's Position Statement.

2. Identify each individual who was involved in the decision to terminate Plaintiff in February 2016, and describe each individual's role and input into that decision.

ANSWER: Nir Aharoni, Christopher Swartz, and Jennifer Flaisher. The decision was made by consensus in consultation with Teva USA's in-house counsel Thomas McDonough.

3. State with specificity each and every legitimate, non-discriminatory reason as to why Defendants placed Plaintiff on a Performance Improvement Plan in October 2015.

ANSWER: Plaintiff was placed on a PIP by Teva USA because of deficiencies with regard to his performance in his role as Senior Director of North American Facilities Management. These deficiencies are documented in his PIP (TEVA (SM) 000702-705) and 2014 performance review (TEVA (SM) 000666-680) and in communications regarding Plaintiff's performance, including but not limited to TEVA (SM) 000391, and may be further explored at depositions in this matter.

4. Identify each individual who was involved in the decision to place Plaintiff on a Performance Improvement Plan in October 2015, and describe each individual's role and input into that decision.

ANSWER: Nir Aharoni, Jennifer Flaisher, Mini Rodriguez, and Ilanit Shtrouchler. It was determined by Teva USA Human Resources in conjunction with Mr. Aharoni and Ms. Shtrouchler that Plaintiff should be placed on a PIP.

5. Identify, by name, date of birth, national origin, dates of employment, title, and direct supervisor, each and every employee of (a) Defendants' North American Facilities Management organization; (b) Defendants' Global Facilities Management organization; and, (c) Defendant Teva USA Pharmaceuticals USA, Inc., who has been terminated since January 1, 2012 through the present time, and identify the reason(s) and date(s) for the action taken. Your answer should include last known contact information for each person identified.

ANSWER: Defendants object to the request as overly broad, unduly burdensome and seeking information that is irrelevant and disproportional to the needs of the case. Defendants further object to this request to the extent it seeks information that is confidential as to an individual, except for Plaintiff, including personnel information for former employees of Defendants and related companies. Non-objectionable confidential personnel information for former employees will only be produced in accordance with applicable law and subject to an appropriate Confidentiality Stipulation and/or Protective Order. Subject to the foregoing objections and pursuant to the executed Stipulation of Confidentiality in this matter, Teva USA has produced a list of employees who have been terminated from Plaintiff's group (NAFM) and Nir Aharoni's group (GFM) from January 1, 2014 to the present, including the employees' name, age, position, department, dates of employment, country and reason for termination, at CONFIDENTIAL TEVA(SM) 002460.

6. State with specificity each and every instance where Defendants allege that Plaintiff was in any way deficient in connection with the performance of his duties while employed with Defendants.

ANSWER: Defendants object to this request to the extent that it is overly broad, unduly burdensome and seeks information that is irrelevant and disproportional to the needs of the case. Subject to the foregoing objections, see Plaintiff's PIP (TEVA (SM) 000703-705) and other documentation regarding Plaintiff's performance including but not limited to Plaintiff's 2014 performance review (TEVA (SM) 000667-680) and PIP summary (TEVA (SM) 00713-718).

7. State with specificity, as of February 1, 2016, the compensation (including, but not limited to, salary, bonuses, and stock options) and benefits (including, but not limited to, medical insurance and retirement benefits) earned and/or received by Plaintiff and how the same were calculated.

ANSWER: Plaintiff's annual salary from Teva USA upon separation was \$192,011.88 (effective March 2, 2015). He had a 30% target bonus and received a bonus in the amount of \$56,371.75 on March 13, 2015 from Teva USA. As he was not active upon bonus payout in 2016, he did not receive one. By way of further response, see documents regarding Plaintiff's compensation and benefits among TEVA (SM) 000082-161.

8. Describe in detail the value (both by cost to the company, as well as the replacement value to Plaintiff) of each and every benefit that Plaintiff had as part of his employment with Defendants as of February 1, 2016, including, but not limited to, health insurance; dental insurance; life insurance; disability insurance; vacation; retirement benefits; pension plan; and, sick leave/vacation policies.

ANSWER: Defendants object to the request to the extent that it is overly broad, unduly burdensome and seeks information that is irrelevant and disproportional to the needs of the case. Defendants further object to this request as vague and ambiguous as the phrase "replacement value to the plaintiff" is vague and undefined. Defendants further object to this request as misleading as Plaintiff was not employed by Defendants; he was employed by Defendant Teva USA only. Subject to the foregoing objections, see documents regarding Plaintiff's benefits at TEVA (SM) 000082-111 and 146-160. By way of further response, per Teva Pharmaceuticals Retirement Savings Plan employees would receive matching and defined contributions in accordance with the Plan terms and applicable law;

Plaintiff received a 2015 defined contribution on March 9, 2016 in the amount of \$10,012.49 and his 2015 true up in the amount of \$1,764.35 on April 14, 2016.

9. Identify by name, job title, direct supervisor, date of birth, national origin, date of hire, and, if applicable, date of termination and reason(s) for termination, each and every person who, following Plaintiffs termination, performed any of the work and/or duties previously performed by Plaintiff prior to his termination.

ANSWER: Senior Director Dan Ramirez who was already working as the Latin America Facilities Management Region Director assumed Plaintiff's duties after Plaintiff's termination, and after the decision was made to combine the Latin America and North America Regions, Mr. Ramirez became the Americas Facilities Management Region Director in or around June 2016. Mr. Ramirez is American, was born on [REDACTED] 1978 and is supervised by Nir Aharoni. Mr. Ramirez was hired by Teva USA on or about August 3, 2015.

Dated: March 15, 2018

STEVENS & LEE

By: /s/ Larry J. Rappoport
Larry J. Rappoport, Esquire
Attorney ID No. 26922
1818 Market Street
29th Floor
Philadelphia, PA 19103
Phone: (215) 496-3839
Email: ljr@stevenslee.com
Jennifer A. Ermilio, Esquire
Attorney ID No. 82062
620 Freedom Business Center, Suite 200
King of Prussia, PA 19406
Phone: (610) 205-6044
Email: jae@stevenslee.com

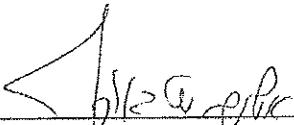
Attorneys for Defendants

VERIFICATION

I, Ilanit Shtrouchler, am a Human Resources Global Business Partner at Teva Pharmaceutical Industries Limited, a defendant in this matter and am authorized to verify the foregoing Second Amended Answers to Plaintiff's First Interrogatories. I am informed and believe that the matters stated in the responses are true and accurate and on that ground verify that the same are true and correct.

I verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: March 14, 2018



Ilanit Shtrouchler

CERTIFICATE OF SERVICE

I, Jennifer A. Ermilio, certify that on this date, I served a true and correct copy of the foregoing Defendants' Second Amended Answers to Plaintiff's First Interrogatories upon the following counsel of record, by emailing and depositing the same in the United States mail, postage prepaid, addressed as follows:

Stephen Console
Caren N. Gurmankin
Console Mattiacci Law LLC
1525 Locust St., 9th Floor
Philadelphia, PA 19102
Console@consolelaw.com
Gurmankin@consolelaw.com

/s/ Jennifer A. Ermilio

Date: March 15, 2018

Exhibit "27"

Performance Management Full Report



Middlebrooks, Stephen W.

Personal Information

Email: stephen.middlebrooks@levapharm.com Hire Date: 4/30/2001
 Global Employee ID: 11803
 Local Employee ID: 1823

Performance Plan: 2007

Planning period: 2007
 Valid from - to: 1/1/2008 - 3/12/2008 Plan owner: -Vacant-

Legend: Manager Evaluation Interim Review

Goals

Goal	Weighting	Not Applicable	Below	Mostly Meets	Meets	Exceeds	Exceptional
------	-----------	----------------	-------	--------------	-------	---------	-------------

Competencies

Competency	Not Applicable	Below	Mostly Meets	Meets	Exceeds	Exceptional
------------	----------------	-------	--------------	-------	---------	-------------

Overall evaluation

	Below	Mostly Meets	Meets	Exceeds	Exceptional
Overall evaluation			X		

Performance Evaluation Session Date: March, 12 2008

Employee comments

Employee Acknowledgement comments

Performance Notebook

Strengths

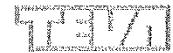
Strength

Has integrity, reliability and loyalty
 Professional at the HARD services and have tactical management capabilities
 Safety and QA are top priority
 service-oriented, team player
 Strong commitment to Teva, to US, to GFM and mainly to his staff
 Understand the complexity of managing suppliers
 Work well in a familiar environment

G-Top - Teva's Global Talent Platform

Performance Management

Full Report



Needs

Need

Communication activities of the organization + participating at th BU+global unites mangmant meeting

Express an opinion, ask questions and seek clarification unclear to topics or not agreed.

Learn the cultural differences in dealing with the various parties in the organization

Learning of the SOFT SERVICES and implementing the work program at this area.

Required to improve the speed of execution of tasks

To strengthen his strategic management skills, proactive, assertiveness.

Transmission of information to managers who report to him

Development Activities

Development Objective	Development Aimed to	Activity Area	Proposed Activity	Target Date	Status
Learn more about sustainable buildings and construction	Enhance strength	Education	Attend one ISPE training (or equivalent) program	12/31/2014	Approved

Next Year's Goals

May, 19 2016

Signed: -Vacant-

Signed: Middlebrooks, Stephen W.

Exhibit "28"

G-Top - Teva's Global Talent Platform

Performance Management

Full Report



Middlebrooks, Stephen W.

Personal Information

Email: stephen.middlebrooks@tevapharm.com Hire Date: 4/30/2001
 Global Employee ID: 11803
 Local Employee ID: 1823

Performance Plan: 2009

Planning period: 2009
 Valid from - to: 1/1/2009 - 12/31/2009 Plan owner: Not, Emp

Legend: Manager Evaluation Interim Review

Goals

Goal	Weighting	Not Applicable	Below	Mostly Meets	Meets	Exceeds	Exceptional
------	-----------	----------------	-------	--------------	-------	---------	-------------

Competencies

Competency	Not Applicable	Below	Mostly Meets	Meets	Exceeds	Exceptional
------------	----------------	-------	--------------	-------	---------	-------------

Overall evaluation

	Below	Mostly Meets	Meets	Exceeds	Exceptional
Overall evaluation			X		

Performance Evaluation Session Date: December, 31 2009

Employee comments

Manager comments

Employee Acknowledgement comments

Performance Notebook

Strengths

Strength

Has integrity, reliability and loyalty
 Professional at the HARD services and have tactical management capabilities
 Safety and QA are top priority
 service-oriented, team player
 Strong commitment to Teva, to US, to GFM and mainly to his staff
 Understand the complexity of managing suppliers

G-Top - Teva's Global Talent Platform

Performance Management

Full Report

TEVA

Work well in a familiar environment

Needs

Need

Communication activities of the organization + participating at the BU+global unites management meeting

Express an opinion, ask questions and seek clarification unclear to topics or not agreed.

Learn the cultural differences in dealing with the various parties in the organization

Learning of the SOFT SERVICES and implementing the work program at this area.

Required to improve the speed of execution of tasks

To strengthen his strategic management skills, proactive, assertiveness.

Transmission of information to managers who report to him

Development Activities

Development Objective	Development Aimed to	Activity Area	Proposed Activity	Target Date	Status
Learn more about sustainable buildings and construction	Enhance strength	Education	Attend one ISPE training (or equivalent) program	12/31/2014	Approved

Next Year's Goals

May, 19 2016

Signed: Not, Emp

Signed: Middlebrooks, Stephen W.

Exhibit "29"

G-Top - Teva's Global Talent Platform

Performance Management

Full Report

10/10/11

Middlebrooks, Stephen W.

Personal Information

Email: stephen.middlebrooks@tevapharm.com Hire Date: 4/30/2001
 Global Employee ID: 11803
 Local Employee ID: 1823

Performance Plan: 2011

Planning period: 2011
 Valid from - to: 1/1/2011 - 12/31/2011 Plan owner: Not, Emp

Legend: Manager Evaluation Interim Review

Goals

Goal	Weighting	Not Applicable	Below	Mostly Meets	Meets	Exceeds	Exceptional
------	-----------	----------------	-------	--------------	-------	---------	-------------

Competencies

Competency	Not Applicable	Below	Mostly Meets	Meets	Exceeds	Exceptional
------------	----------------	-------	--------------	-------	---------	-------------

Overall evaluation

	Below	Mostly Meets	Meets	Exceeds	Exceptional
Overall evaluation				X	

Performance Evaluation Session Date: March, 31 2012

Employee comments

Manager comments

Employee Acknowledgement comments

Performance Notebook

Strengths

Strength

Has integrity, reliability and loyalty
 Professional at the HARD services and have tactical management capabilities
 Safety and QA are top priority
 service-oriented, team player
 Strong commitment to Teva, to US, to GFM and mainly to his staff
 Understand the complexity of managing suppliers

G-Top - Teva's Global Talent Platform

Performance Management

Full Report



Work well in a familiar environment

Needs

Need

Communication activities of the organization + participating at th BU+global unites mangmant meeting

Express an opinion, ask questions and seek clarification unclear to topics or not agreed.

Learn the cultural differences in dealing with the various parties in the organization

Learning of the SOFT SERVICES and implementing the work program at this area.

Required to improve the speed of execution of tasks

To strengthen his strategic management skills, proactive, assertiveness.

Transmission of information to managers who report to him

Development Activities

Development Objective	Development Aimed to	Activity Area	Proposed Activity	Target Date	Status
Learn more about sustainable buildings and construction	Enhance strength	Education	Attend one ISPE training (or equivalent) program	12/31/2014	Approved

Next Year's Goals

Goals for: 2012, Plan Status - Completed

Title

Right First Time

Weighting

20 %

Description

Establish and manage maintenance programs at the sites under my direct control with the target to improve the total percent of planned work orders by 10%.

Success Measures

These maintenace statistics will be gathered from our CMMS programs and published monthly in the facilities engineering monthly report.

Complete By

12/31/2012

Weighting

10 %

Title

Safety and Environmental Compliance

Description

Establish and manage programs to maintain zero loss time accidents, and zero OSHA recordable accidents for all of the facilities engineering department, and all of our contractors. Operate all facilities under my direct supervision with the goal of zero environmental incidents.

Success Measures

Safety results will be determined by the EH&S department, and reported monthly in the facilities engineering monthly report. Environmental statistics will be collected by the EH&S department and reported in the facilities engineering monthly report.

Complete By

12/31/2012

G-Top - Teva's Global Talent Platform

Performance Management

Full Report

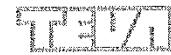


Title	Weighting
Quality	15 %
Description	
The facilities engineering department will create and maintain all drawings and SOP's, and comply with training requirements so that all of the facilities under our direct control will be in compliance with regulatory requirements.	
Success Measures	
Each site will be audited during the year and address all issues on non compliance.	
Complete By	
12/31/2012	
Title	Weighting
Cost and energy savings	10 %
Description	
Identify areas for cost or energy savings, calculate the return on investment, submit capital projects for approval, and complete all funded projects.	
Success Measures	
Set up a savings measurement at the time of project submission, and track the results to verify the success of the projects. Savings results will be reported in the facilities engineering monthly report.	
Complete By	
12/31/2012	
Title	Weighting
Project Management and Expense budget control	25 %
Description	
Establish priorities, submit projects and manage projects to successful completion within the constraints of the 2012 capital Budget, and the 2012 Expense budget. Office renovations for the Cephalon integration NW Paving project - final phase Implement CMMS at all remaining sites	
Success Measures	
Successfully complete all project on time and within budget. Manage the department within the 2012 expense budget.	
Complete By	
12/31/2012	
Title	Weighting
Support corporate initiatives - not yet defined for 2012	10 %
Description	
Support major corporate initiatives not currently defined for 2012. These could include integrations, plant consolidations, new facility construction, or major expansions.	
Success Measures	
Facilities support provided to meet the overall corporate project goals.	
Complete By	
12/31/2012	

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Performance Management

Full Report



Title	Weighting
Personal goal	10 %
Description	
Improve my technical skills in the area of GMP laboratory and API facility construction and maintenance to help me better support these operations which have been added to my area of responsibilities.	
Success Measures	
Attend at least one ISPE certified training program this year covering one of these areas.	
Complete By	
12/31/2012	

May, 19 2016

Signed: Not, Emp

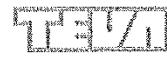
Signed: Middlebrooks, Stephen W.

Exhibit "30"

G-Top - Teva's Global Talent Platform

Performance Management

Full Report



Middlebrooks, Stephen W.

Personal Information

Email: stephen.middlebrooks@tevapharm.com Hire Date: 4/30/2001
 Global Employee ID: 11803
 Local Employee ID: 1823

Performance Plan: Teva - Performance Plan 2012 (GL1CT03)

Planning period: 2012
 Valid from - to: 1/1/2012 - 12/31/2012 Plan owner: Urban, Robert J.

Legend: Manager Evaluation Interim Review

Goals

Goal	Weighting	Not Applicable	Below	Mostly Meets	Meets	Exceeds	Exceptional
Project Management and Expense budget control	25.00				(I)	X	
Establish priorities, submit projects and manage projects to successful completion within the constraints of the 2012 capital Budget, and the 2012 Expense budget.							
Office renovations for the Cephalon integration							
NW Paving project - final phase							
Implement CMMS at all remaining sites							
Success Measures	Successfully complete all project on time and within budget. Manage the department within the 2012 expense budget.						
Manager comments	Steve was able to stay within his 2012 expense budget even though additional projects were added, most notably, the Cephalon integration.						
Interim Review comments							
Employee comments	<p>2012 was a very successful year with respect to the prioritization, submission and completion of capital projects. With the integration of Cephalon taking place after the 2012 capital budget was developed and submitted for upper management approval, I was still able to prioritize the most important projects, get them approved and complete the projects within budget. My group and I completed the office renovations and the associated personnel moves associated with the Cephalon integration, completed the NW paving project, and moved the CMMS project closer to full implementation across all of the sites. We were also able to design and build an office complex for our CEO in NYC, and contribute to the design of the new KC office building. Both of these projects were added to our assignments after the year began, and our expense budgets were in place. I managed to stay within the expense budget in spite of all of these changes.</p> <p>We also successfully completed a series of smaller capital projects in NW1, NW2, Privet, the Glades, TAH, and at the BRC. Overall, an outstanding effort by the entire team.</p>						
Right First Time	20.00				X (I)		
Establish and manage maintenance programs at the sites under my direct control with the target to improve the total percent of planned work orders by 10%.							
Success Measures	These maintenance statistics will be gathered from our CMMS programs and published monthly in the facilities engineering monthly report.						
Manager comments	Planned improvements were made in Steve's maintenance programs.						
Interim Review comments							

Performance Management

Full Report

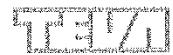
TEVA

Employee comments		Maintenance statistics have been developed and reported for all of the sites under my direct management, and we have far exceeded this goal of a 10% reduction in unplanned work orders. The preventative maintenance program at my sites is getting stronger every day as we continue to add new PM schedules to our Datastream system. An excellent job with very limited resources.			
Quality	15.00		X (I)		
The facilities engineering department will create and maintain all drawings and SOP's, and comply with training requirements so that all of the facilities under our direct control will be in compliance with regulatory requirements.					
Success Measures		Each site will be audited during the year and address all issues on non compliance.			
Manager comments		Required GMP drawings were updated as planned.			
Interim Review comments					
Employee comments		A list of required GMP facilities drawings was developed early in 2012, and all of my sites prepared these drawings and circulated them for review and approval. All of the drawings were finally approved and the signed copies are now on file at each site.			
Success Measures		Facility related SOP's for the sites under my direct management have been prepared, approved, implemented and employee training is complete.			
Manager comments		Training programs were developed for every member of the facilities department, and through the use of compliance wire and LMS, these training programs are active and up to date.			
Cost and energy savings	10.00		(I)	X	
Identify areas for cost or energy savings, calculate the return on investment, submit capital projects for approval, and complete all funded projects.					
Success Measures		Set up a savings measurement at the time of project submission, and track the results to verify the success of the projects. Savings results will be reported in the facilities engineering monthly report.			
Manager comments		Steve negotiated energy contracts that are estimated to save Teva \$400,000 per year.			
Interim Review comments					
Employee comments		With a limited capital budget in 2012, we were not able to fund any large cost savings capital projects, but we did install insulation in NW2, air distribution fans in NW1, and automatic lighting controls in a series of office areas. We were also able to negotiate energy contracts which will save Teva over \$400K per year for the next two years.			
Personal goal	10.00	X			
Improve my technical skills in the area of GMP laboratory and API facility construction and maintenance to help me better support these operations which have been added to my area of responsibilities.					
Success Measures		Attend at least one ISPE certified training program this year covering one of these areas.			
Manager comments		This goal was postponed to 2013.			
Interim Review comments					
Employee comments		During the last half of 2012, I was not able to find a local ISPE course that met my improvement goals, and with the budget tightening measures now in place, I have decided postpone this activity until next year.			
Safety and Environmental Compliance	10.00		(I)		

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Performance Management

Full Report



Establish and manage programs to maintain zero loss time accidents, and zero OSHA recordable accidents for all of the facilities engineering department, and all of our contractors. Operate all facilities under my direct supervision with the goal of zero environmental incidents.

Success Measures						
	Safety results will be determined by the EH&S department, and reported monthly in the facilities engineering monthly report. Environmental statistics will be collected by the EH&S department and reported in the facilities engineering monthly report.					
	By definition, one accident did not meet the stated goal of zero accidents.					
Manager comments						
Interim Review comments						
Employee comments	We had an excellent safety record this year in the facilities department, but we did not achieve our goal of zero accidents for our employees, contractors and consultants. One of our employees suffered a back injury related to the office and furniture moves associated with the Cephalon integration. Thankfully, the injury turned out to be short lived, and the employee came back to work the next day. Work instructions and procedures have been put in place to ensure that this will injury will not occur again in the future.					
Support corporate initiatives - not yet defined for 2012	10.00			(I)	X	
Support major corporate initiatives not currently defined for 2012. These could include integrations, plant consolidations, new facility construction, or major expansions.						
Success Measures	Facilities support provided to meet the overall corporate project goals.					
Manager comments	Steve did an excellent job supporting several unplanned major initiatives during 2012.					
Interim Review comments						
Employee comments	The support of corporate initiatives kept our entire group busy this year. We have supported the KC building project, the NYC office project, TAH validation effort, sale of the Rock Hill property, the sublease of the City Line Ave property, and the administrative support of the P&G facilities.					

Competencies

Competency	Not Applicable	Below	Mostly Meets	Meets	Exceeds	Exceptional
A - Excellence in Execution					X	
Manager comments	Steve and his team have done a very good job executing capital projects and managing the tremendous amount of moves associated with the Cephalon integration.					
Interim Review comments						

Performance Management

Full Report



	Employee comments	<p>I have managed my group through a very difficult year, filled with unexpected changes in priorities associated with the extensive integration activities. The group has performed at a very high level and morale has improved as the team came together to meet the demands of the business. We have worked with the proper level of urgency to meet our objectives and have utilized our resourcefulness to make our disparate systems work. During all of our activities, quality and safety practices have been our primary concerns and everyone on our team shares this mindset. No project can be a success if either of these principals is neglected. I have established ambitious goals for the department and effectively prioritized the entire group to meet these goals, even as the business priorities have changed throughout the year. We have implemented procedural improvements to optimize our performance and agility.</p> <p>I fully understand the company code of conduct and ensure that every member of the department conducts themselves in accordance with those codes. I have been required to keep some business information confidential during the year, and I have used appropriate discretion when discussing these issues with others. I have demonstrated excellence in execution in 2012, as defined by the bullet points listed above, and the 2012 results for the Facilities Engineering Department have been impressive, by any measure. The success of the Facilities Engineering Department is due to both the hard work and dedication of our team members and my leadership of the group.</p>										
B - Customer Orientation		<table border="1"> <tr> <td></td><td></td><td></td><td></td><td>X</td><td></td></tr> </table>									X	
				X								
	Manager comments	<p>Steve and his group effectively manage assigned office and laboratory facilities. I rarely receive a complaint, and issues are addressed before they are escalated to me.</p>										
	Interim Review comments											
	Employee comments	<p>The Facilities Engineering Department is a service organization that exists to meet the business needs of the Administrative, Distribution, Manufacturing, and R&D departments throughout the US. I have developed and maintained excellent relationships with all of these customers, and have gained their trust and respect over a period of years. I have held regular meetings with these customers to ensure that my group and I are providing them with best in class service. We have improved our service levels this year by implementing changes suggested by our customers. Customer orientation is one of our key initiatives and we are proud of our well deserved excellent customer relationships.</p>										
C - Strategic Vision		<table border="1"> <tr> <td></td><td></td><td></td><td>X</td><td></td><td></td></tr> </table>								X		
			X									
	Manager comments	<p>Steve and his department continue to meet business growth needs.</p>										
	Interim Review comments											
	Employee comments	<p>In spite of the ever changing landscape of the short term roles and responsibilities of the Facilities Engineering Department, I have been able to develop a long term vision for the department which supplies a reasonably stable framework for our team work within. This long view of our responsibilities allows us to move forward even as major changes and challenges are placed before us. We have not always been able to implement the optimal strategies for the business, but we have implemented successful programs that have added to the success of the business overall.</p>										
D - Change Leadership		<table border="1"> <tr> <td></td><td></td><td></td><td></td><td>X</td><td></td></tr> </table>									X	
				X								
	Manager comments	<p>With the Cephalon integration, there were many changes during 2012. Steve and his team effectively managed and promoted the needed changes.</p>										
	Interim Review comments											
	Employee comments	<p>Change leadership defined the Facilities Engineering department in 2012. We were in the forefront of the entire Cephalon integration process. Our change management started off with the joining of two strong facilities departments into a unified and effective team that went on to tackle some of the most challenging aspects of the integration process. We combined our talents and were able to move over 1100 employees in 8 months, touching almost every department in the company. This was a daunting task, and our group took it on with a single minded determination. Renovating the office space as we went, we engaged each group to join with us to take on and even embrace the coming changes. Our efforts were hampered at every turn by the low morale and uncertainty of the groups being moved, but our group persevered and move process was completed. This was an outstanding effort and a prime example of change leadership.</p>										

Performance Management

Full Report



E - Team Leadership	Manager comments			X	
	Interim Review comments	Steve does an effective job managing and leading his department.			
	Employee comments	<p>I started off the year by inheriting a new group, doubling my number of direct and indirect reports, and adding 10 new facilities to my list of primary responsibilities. I had to meet all of these new team members and evaluate their strengths and weaknesses, establish clear goals, and gain their trust so that we could quickly contribute to the success of the integration process at hand. Working closely with my new facilities team members, I was able to delegate and empower the team to develop solutions to their common problems, and to help them discover a sense of team identity. Once the team was moving forward, I transitioned into a support role, removing obstacles, encouraging resourcefulness, and rewarding achievements. The team has now completed its first set of initiatives, and they have now transformed into a team that is setting longer range goals and developing new methods and procedures to become more efficient in the future. We have come a long way in one year, and I am looking forward to see what we can accomplish next year.</p>			
			X		
F - Professional Expertise	Manager comments	Steve has many years of experience building, managing, and maintaining facilities. His expertise was valuation for the Kansas City and New York office projects.			
	Interim Review comments				
	Employee comments	<p>I was asked on two separate occasions this year to use my specific knowledge to contribute directly to the success of the company. In the early part of the year I was asked to review the designs of the new Kansas City office facility. I attended one design meeting with the architects and design engineers and uncovered serious design deficiencies with their plans. After reviewing my suggestions, the senior management in Kansas City requested that I continue working on this project through its completion in Q3 2013. Soon after that, I was asked to design and manage the construction of a very high profile office construction project in New York City. I worked on this project through the end of July, and successfully completed this very complex project with excellent support from Ellen Cicak and members of the IT, Purchasing, Accounts Payable and Finance departments.</p>			
			X		
G - Collaboration and Influencing	Manager comments	Steve works well with customer departments, satisfying their needs and addressing concerns so that issues are not escalated.			
	Interim Review comments				
	Employee comments	<p>In my position as Director of the Facilities Engineering department, I very rarely have the authority to make unilateral decisions about the major initiatives for US facilities, yet I have a proven track record of effectively influencing our business executives to support these initiatives which positively impact business performance. I have utilized both our formal and informal business structures, along with my ability build consensus with key business leaders to push new projects through the system. This year we were able to install a major upgrade to our BMS systems in the Distribution centers, upgrade our Primary Data Center and the emergency power systems that protects our data. We completed the fit out of the NW2 facility, which made the Cephalon integration possible. We designed and constructed the new conference center in NW1, and renovated hundreds of work spaces to meet the changing needs of our business groups. Instituted our CMMS system at all of the legacy Teva locations under my direct supervision, and supported the roll out of the CMMS version upgrade to all of our manufacturing and R&D sites in support of our global GMP quality requirements.</p>			
			X		
H - Business Acumen	Manager comments	Steve instituted significant cost savings projects in 2012 and improved the robustness and reliability of IT and distribution infrastructure.			
	Interim Review comments				

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Performance Management

Full Report

T0101

Employee comments

Throughout 2012, I have worked with various groups outside of the traditional facilities area to bring value to the corporation. Working with Summit Energy and the cross functional energy committee, we were able to negotiate preferred rates from our energy providers, and lock in nearly \$400K of savings in for each of the next two years. Working with IT I was able to identify an area of vulnerability in our business continuity plan and develop a capital plan to improve our emergency response capabilities. As the leader of the Corporate Maintenance Committee (CMC) I was able to work with our plant maintenance and engineering groups on the identification and resolution of a number of issues that were common across all of our manufacturing sites. Working with the procurement group, I was also responsible for developing and instituting major changes to the Oracle capital procurement system that streamlined the capital approval process, and improved our overall efficiency.

Overall evaluation

	Below	Mostly Meets	Meets	Exceeds	Exceptional
Overall evaluation			X		

Performance Evaluation Session Date

January, 3 2013

Employee comments

2012 has been a challenging year that has resulted in the successful completion of a series of capital and expense projects which have each helped to improve and reshape the Teva's business in the US. We took on and completed the facility integration associated with the Cephalon acquisition. This was a difficult and physically demanding project that took 8 full months to complete. The combined facilities team came together during this project and showed their ingenuity and perseverance in the face of adversity. The maintenance teams continued to provide excellent service to their customers in spite being short handed most of the year. Our capital team completed major improvements to our Distribution BMS systems, our Primary Data Center and its associated electrical systems, our NW1 conference center, and the completion of the NW2 office facility. I have also been a major contributor to the design and construction of the new office building in Kansas City and I was the project manager of the office construction project in New York City. With the addition of the former Cephalon employees, I now have a total of 6 direct reports and 39 total employees in my department, and direct responsibility for 19 Teva facilities. I have continued to manage employees, projects, and customer relationships in spite of my increased responsibilities in 2012. For these reasons I feel strongly that I should be rated as an exceeds performer in 2012.

Manager comments

Steve had a very good year completing capital projects, supporting the Cephalon integration, reducing costs, and effectively running numerous facilities while staying within the approved 2012 expense budget.

Employee Acknowledgement comments

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Performance Notebook

Strengths

Strength

Has integrity, reliability and loyalty

Professional at the HARD services and have tactical management capabilities

Safety and QA are top priority

service-oriented, team player

Strong commitment to Teva, to US, to GFM and mainly to his staff

Understand the complexity of managing suppliers

Work well in a familiar environment

G-Top - Teva's Global Talent Platform

Performance Management

Full Report



Needs

Need

Communication activities of the organization + participating at th BU+global unites mangment meeting
 Express an opinion, ask questions and seek clarification unclear to topics or not agreed.
 Learn the cultural differences in dealing with the various parties in the organization
 Learning of the SOFT SERVICES and implementing the work program at this area.
 Required to improve the speed of execution of tasks
 To strengthen his strategic management skills, proactive, assertiveness.
 Transmission of information to managers who report to him

Development Activities

Development Objective	Development Aimed to	Activity Area	Proposed Activity	Target Date	Status
Learn more about sustainable buildings and construction	Enhance strength	Education	Attend one ISPE training (or equivalent) program	12/31/2014	Approved

Next Year's Goals

Goals for: 2013, Plan Status - Completed

Title

People Development

Weighting

10 %

Description

Increase Supervisory / Managerial capabilities through ongoing feedback, coaching, assessment, training and development. Drive higher levels of engagement by demonstrating leadership behaviors that create an energized and positive work environment, while promoting inclusion, trust, teamwork, and Teva values.

Success Measures

- Improved decision making skills and higher levels of delegation while maintaining increasingly positive results for the department.

Complete By

12/31/2013

Weighting

20 %

Title

Safety

Description

Target zero recordable injuries and zero lost time injuries for everyone in our department and for all of the contractors and vendors we have working on our projects.

Success Measures

EHS reports with zero lost time accidents for my department, and contractors.
 EHS reports with zero OSHA recordable accidents for my reports and contractors.

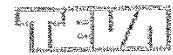
Complete By

12/31/2013

G-Top - Teva's Global Talent Platform

Performance Management

Full Report



Title	Weighting
Customer Service	10 %
Description	
Work with the management teams in NW, Frazer and Weston to provide office, cube, and conference space and furniture to accommodate new hires and transfers in 2013, and improve the budgeting process for office space / renovations / furniture in 2014	
Success Measures	
<ul style="list-style-type: none"> - Supply office and cube space for all Teva FTE in the region. - Develop and implement a capital budgeting process for office renovations for the 2014 WP. 	
Complete By	
12/31/2013	
Title	Weighting
Cost Savings / Cost Avoidance	20 %
Description	
<ul style="list-style-type: none"> - Work with Summit Energy on energy procurement agreements, and with my engineering group to design and implement capital projects to reduce our overall energy spend by \$500K in 2013. - Coordinate the closure of the Aegon facility which will be a rent and utility cost savings of ~ \$300K in 2013. 	
Success Measures	
<ul style="list-style-type: none"> - Comparison of actual energy spend vs projected spend at market prices - Successful closure of the Aegon facility in August of 2013. 	
Complete By	
12/31/2013	
Title	Weighting
Project Management	10 %
Description	
Complete the North Wales Fitness Center project by June 2013 as a joint goal with the HR & EH&S departments.	
Success Measures	
Successful start up of the fitness center in NW2 By July 1, 2013	
Complete By	
7/1/2013	
Title	Weighting
Project Management	10 %
Description	
Complete the KC Office project by October 2013. This includes the building fit out, furniture, AV & IT requirements, personnel moves and the clean-out / turn-over of the existing leased building in KC.	
Success Measures	
Full use of the new building and turn over of the existing building to the landlord.	
Complete By	
10/1/2013	

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TEVA

Title	Weighting
Project Management	10 %
Description Complete the Datastream software version upgrade project by June 2013 as a joint goal with Plant Operations, IT and the Engineering Technologies department.	
Success Measures New version of DataStream up and running at the NW site.	
Complete By 7/1/2013	
Title	Weighting
Support Corporate Initiatives	10 %
Description Support the implementation of corporate projects as required throughout the year. These represent new corporate initiatives that have not yet been scoped or budgeted.	
Success Measures Successful completion of unbudgeted corporate projects as they develop during 2013.	
Complete By 12/31/2013	

May, 19 2016

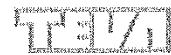
Signed: Urban, Robert J.

Signed: Middlebrooks, Stephen W.

Exhibit "31"

Performance Management

Full Report



Middlebrooks, Stephen W.

Personal Information

Email	stephen.middlebrooks@tevapharm.com	Hire Date	4/30/2001
Global Employee ID	11803		
Local Employee ID	1823		

Performance Plan (Teva's Performance Plan 2013 (C102))

Planning period	2013	Valid from - to	1/1/2013 - 12/31/2013	Plan owner	Allomare, Steven L.
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Legend: Manager Evaluation (I) Interim Review

Goals

Goal	Weighting	Not Applicable	Below	Mostly Meets	Meets	Exceeds	Exceptional
Cost Savings / Cost Avoidance	20.00					X (I)	
– Work with Summit Energy on energy procurement agreements, and with my engineering group to design and implement capital projects to reduce our overall energy spend by \$500K in 2013.							
– Coordinate the closure of the Aegon facility which will be a rent and utility cost savings of ~ \$300K in 2013.							
Success Measures							
Manager comments							
Interim Review comments							
Employee comments							
Safety	20.00				X (I)		
Target zero recordable injuries and zero lost time injuries for everyone in our department and for all of the contractors and vendors we have working on our projects.							
Success Measures							
Manager comments							
Interim Review comments							
Employee comments							
Customer Service	10.00				X (I)		

– Comparison of actual energy spend vs projected spend at market prices

– Successful closure of the Aegon facility in August of 2013.

The energy cost savings target was exceeded.

Aegon facility closed on schedule. Current energy savings projection exceeds target.

Our energy procurement savings have reached \$850K for this year, far surpassing our goal of \$500.

We successfully coordinated the closure of the Aegon facility in August and we have realized the \$300K in associated energy savings.

We also implemented energy savings projects in NW1, New Britain and Kulztown which have resulted in significant energy savings at those sites. We have fare exceeded this goal for 2013.

EHS reports with zero lost time accidents for my department, and contractors. EHS reports with zero OSHA recordable accidents for my reports and contractors.

No accidents year-to-date.

Goal met through 6 months.

My team and I have work very diligently this entire year to meet this very challenging goal, and as of this date we ave been successful. This is our team's most important goal, and we have succeeded in going an entire year without an injury, for ourselves and for all of our contractors.

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Work with the management teams in NW, Frazer and Weston to provide office, cube, and conference space and furniture to accommodate new hires and transfers in 2013, and improve the budgeting process for office space / renovations / furniture in 2014

Success Measures					
	- Supply office and cube space for all Teva FTE in the region.				
	- Develop and implement a capital budgeting process for office renovations for the 2014 WP.				
	Required offices and facilities were delivered as needed.				
Manager comments	On target.				
Interim Review comments					
Employee comments	We have successfully kept pace with the ever changing requirements for office space in the US. When you take into account the KC, Aegon and Weston moves, we moved over 1400 employees in 2013. We creatively allocated and constructed office space for the many new executives hired in 2013, and used our inventory of used furniture to keep our costs down. We were able to improve the 2014 capital program by setting up capital review meetings with senior executives during the budgeting process. This entire process is very difficult and time consuming, but I believe we met or exceeded all of the objects set forth in this goal.				
People Development 10.00			X (I)		
Increase Supervisory / Managerial capabilities through ongoing feedback, coaching, assessment, training and development. Drive higher levels of engagement by demonstrating leadership behaviors that create an energized and positive work environment, while promoting inclusion, trust, teamwork, and Teva values.					
Success Measures	- Improved decision making skills and higher levels of delegation while maintaining increasingly positive results for the department.				
Manager comments	People in the department have taken on greater roles as planned.				
Interim Review comments	On target.				
Employee comments	I have seen significant growth this year in Michael Mascardo, Radcliff Rodney, Troy Gaugler and Mary Caggiano. Each of these individuals had to step up this year for a variety of reasons. I have been working with each of them throughout the year, and I am pleased with their growth. With the announces layoffs, actual layoffs in the engineering department, and the grim financial news, this group has continued to perform at a high level and achieve excellent results. Morale is not high, but we have maintained a positive attitude. I believe I have exceeded the development goal as stated in my review.				
Project Management 10.00			X (I)		
Complete the North Wales Fitness Center project by June 2013 as a joint goal with the HR & EH&S departments.					
Success Measures	Successful start up of the fitness center in NW2 By July 1, 2013				
Manager comments	The fitness center project was completed on-time and on-budget.				
Interim Review comments	Project completed on time and on budget.				
Employee comments	Our team pulled together and completed this project on time and on schedule. With that being said, I firmly believe that we exceeded our project management goal because the finished Fitness center was far exceeded the expectations of everyone who approved the project, and all of the employees who use the facility.				
Project Management 10.00			(I)	X	
Complete the KC Office project by October 2013. This includes the building fit out, furniture, AV & IT requirements, personnel moves and the clean-out / turn-over of the existing leased building in KC.					
Success Measures	Full use of the new building and turn over of the existing building to the landlord.				

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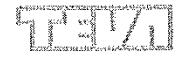


Manager comments	The Kansas City office project was completed on-time and \$2.5 million under budget. Senior management in Kansas City was very pleased with the outcome.					
Interim Review comments	Still possible to meet target despite a 3 week delay due to excessive rain.					
Employee comments	We completed this project on time and \$2.5MM dollars under budget. Once again, the end product exceeded the expectations of both the management and employees in KC. This project was a major team effort, but the facilities team influenced the team in ways that allowed the project to be a success. Without our support, this project would have suffered, and the end result would not have been as dramatic. I consider this to be an exceeds effort bordering exceptional. I want to give special thanks to all of our team members that worked long hours and performed to the highest standards.					
Project Management	10.00			X (I)		
Complete the Datastream software version upgrade project by June 2013 as a joint goal with Plant Operations, IT and the Engineering Technologies department.						
Success Measures	New version of DataStream up and running at the NW site.					
Manager comments	The new version of DataStream was completed on-time. The West Chester R&D facility was converted to DataStream on-time.					
Interim Review comments	Upgrade completed June 24, 2013.					
Employee comments	The upgrade of the EAM software was a high priority project with wide ranging quality and GMP implications for the entire US manufacturing, warehousing and distribution departments. We received some support from plant personnel, but the bulk of this project was carried by the IT and facilities staff. As the system owner, many times it came down to long hours of concentrated effort to carry this project over the finish line. And that is exactly what we did. We complete this project on time in spite of many road blocks and setbacks. And once the upgrade was complete, our team did not stop there, we moved directly into the conversion of the West Chester site from Maximo to EAM. As the first site to make this transfer, we ran into a number of programing issues. Working with IT we addressed each new issue as it arose, devised and implemented a solution, and continued on towards our target. The West Chester Facilities team did an excellent job, and both of the subsequent EAM implementations profited from these efforts. Overall, I believe the team deserves an exceeds rating for the work on these projects.					
Support Corporate Initiatives	10.00			X	(I)	
Support the implementation of corporate projects as required throughout the year. These represent new corporate initiatives that have not yet been scoped or budgeted.						
Success Measures	Successful completion of unbudgeted corporate projects as they develop during 2013.					
Manager comments	Corporate initiatives were supported as required.					
Interim Review comments	Several unplanned projects were completed.					
Employee comments	We have given outstanding support to a series of corporate projects in 2013. Our team prepared the NW1 building for a board meeting that was moved to NW1 with only a few weeks notice. After the meeting, the Board members commented that this was one of the best run meeting they have ever had. Dave Lacher, Ellen Cicak and their teams worked tirelessly to make this happen. We have also completed the construction of the first i2i room in NW1. This is a corporate project that was introduced to us in the second quarter of 2013, and had a very tight schedule and very demanding specifications. We overcame budgeting and location issues, and managed to complete this project 5 months ahead of the other teams working on this project around the world. I would rate our performance in this area as exceeds.					

Competencies

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Competency	Not Applicable	Below	Mostly Meets	Meets	Exceeds	Exceptional
A - Excellence in Execution				X		
Manager comments						
Interim Review comments						
Employee comments	<p>I have managed my group through a very difficult year, filled with unexpected changes in our department structure associated with upper management changes. The group has performed at a very high level and morale has improved as the team came together to meet the demands of the business. This was especially evident during the EAM upgrade and the subsequent EAM implementation in West Chester. This has been an uphill battle because of the recent announcement of layoffs, and the resulting loss of key members of the engineering staff.</p> <p>We have worked with the proper level of urgency to meet our objectives and have utilized our resourcefulness to make our disparate systems work. During all of our activities, quality and safety practices have been our primary concerns and everyone on our team shares this mindset. No project can be a success if either of these principals is neglected. I have established ambitious goals for the department and effectively prioritized the entire group to meet these goals, even as the business priorities have changed throughout the year. We have implemented procedural improvements to optimize our performance and agility.</p> <p>I fully understand the company code of conduct and ensure that every member of the department conducts themselves in accordance with those codes. I have been required to keep some business information confidential during the year, and I have used appropriate discretion when discussing these issues with others. I have demonstrated excellence in execution in 2013, as defined by the bullet points listed above, and the 2013 results for the Facilities Engineering Department have been impressive, by any measure. The success of the Facilities Engineering Department is due to both the hard work and dedication of our team members and my leadership of the group.</p>					
B - Customer Orientation				X		
Manager comments						
Interim Review comments						
Employee comments	<p>The Facilities Engineering Department is a service organization that exists to meet the business needs of the Administrative, Distribution, Manufacturing, and R&D departments throughout the US. I have developed and maintained excellent relationships with all of these customers, and have gained their trust and respect over a period of years. I have held regular meetings with these customers to ensure that my group and I are providing them with best in class service. We have improved our service levels this year by implementing changes suggested by our customers. Customer orientation is one of our key initiatives and we are proud of our well deserved excellent customer relationships.</p>					
C - Strategic Vision				X		
Manager comments						
Interim Review comments						
Employee comments	<p>In spite of the ever changing landscape of the short term roles and responsibilities of the Facilities Engineering Department, I have been able to develop a long term vision for the department which supplies a reasonably stable framework for our team work within. This long view of our responsibilities allows us to move forward even as major changes and challenges are placed before us. We have not always been able to implement the optimal strategies for the business, but we have implemented successful programs that have added to the success of the business overall. I hope to become more involved with the strategic vision for the Facilities Management Department in 2014 as we move forward with the development and implementation of a Global facilities management team.</p>					
D - Change Leadership				X		
Manager comments						
Interim Review comments						

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	Employee comments	<p>Change leadership defined the Facilities Engineering department in 2013. We took the lead in the EAM upgrade project which impacted every site in the US. We were also responsible for the final phases of the Cephalon facilities integration process, with the closure of the Aegon building and the relocation of over 1,400 employees in 2013. (This number includes the KC and Weston moves). This was a daunting task, and our group took it on with a single minded determination. Renovating the office space as we went, we engaged each group to join with us to take on and even embrace the coming changes. We fought to establish and implement national office standards. The success of this program is now yielding true cost savings by allowing Teva to better utilize our office buildings, and close the underutilized facilities. This was an outstanding effort and a prime example of change leadership.</p>				
E - Team Leadership				X		
Manager comments						
Interim Review comments						
	Employee comments	<p>2013 was the second year of the Cephalon / Teva integration for the facilities department. Working closely with my new facilities team members, I was able to delegate and empower the team to develop solutions to their common problems, and to help them discover a sense of team identity. Once the team was moving forward, I transitioned into a support role, removing obstacles, encouraging resourcefulness, and rewarding achievements. The team has now completed its first set of initiatives, and they have now transformed into a team that is setting longer range goals and developing new methods and procedures to become more efficient in the future. We have come a long way in one year, and I am looking forward to see what we can accomplish next year.</p>				
F - Professional Expertise				X		
Manager comments						
Interim Review comments						
	Employee comments	<p>I was asked on two separate occasions this year to use my specific knowledge to contribute directly the success of the company. In the early part of the year I was asked to support the construction management activities for the new Kansas City office facility. I worked on this project through its completion in late September. My technical input was instrumental in moving the project forward, and I was the driving force that influenced a series of critical management decisions, that helped make this project a success. During this same period of time, I was asked to design and manage the construction of a very high profile office construction project in North Wales and Frazer. I have worked on the i2i projects throughout the year, and successfully completed the first conference room and have completed the design of the second one. This was a very complex project, and I received excellent support from Ellen Cicak Mary Caggiano, and members of the IT, and Purchasing departments.</p>				
G - Collaboration and Influencing				X		
Manager comments						
Interim Review comments						
	Employee comments	<p>In my position as Director of the Facilities Engineering department, I very rarely have the authority to make unilateral decisions about the major initiatives for US facilities, yet I have a proven track record of effectively influencing our business executives to support these initiatives which positively impact business performance. I have utilized both our formal and informal business structures, along with my ability build consensus with key business leaders to push new projects through the system. This year we were able to install major upgrades to our BMS systems in the Distribution centers, upgrade the emergency power systems in NW2, install a new fitness center, and design and install a number of energy savings projects in our PA facilities. We completed the construction of the KC facility, and successfully moved into the facility within a very tight timeline. Instituted our EAM system at all of the legacy Teva locations under my direct supervision, and supported the roll out of the EAM version upgrade to all of our manufacturing and R&D sites in support of our global GMP quality requirements.</p>				
H - Business Acumen				X		
Manager comments						
Interim Review comments						

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Employee comments

Throughout 2013, I have worked with various groups outside of the traditional facilities area to bring value to the corporation. Working with Summit Energy and the cross functional energy committee, we were able to negotiate preferred rates from our energy providers, and lock in nearly \$850K of savings. We have supported numerous sites across the US by managing our used furniture inventory, and supplying offices and plans with cost effective furniture solutions. Working with IT I was able to identify an area of vulnerability in our business continuity plan and develop a capital plan to improve our emergency response capabilities. As the business owner of the EAM system, I was able to work with our plant maintenance and engineering groups to successfully implement the EAM system upgrade across all of our manufacturing sites.

Overall evaluation

	Below	Mostly Meets	Meets	Exceeds	Exceptional
Overall evaluation			X		

Performance Evaluation Session Date January, 24 2014

Employee comments

2013 has been a challenging year for me and my entire department. I was personally involved in four major projects this year, the NW2 fitness center, the EAM system upgrade, the KC office construction, and the i2i conference room construction projects. I delegated the NW2 generator project, the Aegon move and closure project, the WC EAM implementation, the Weston office construction, the Glades laboratory expansion project to various members of my department. All of these projects listed above were successfully completed, along with all of the required maintenance at all of our sites. All of our project and maintenance work was complete without a single recordable accident or loss of time injury. We were able to accomplish this in spite of the fact that we were running two people short for most of the year, and lost one of our key contributors due to reorganization. Our results for the year are nothing short of exceptional, and I have met or exceeded all of my stated goals for the year. For these reasons I feel that I should be rated as an exceeds performer, and because of my increased reach in the organization over the past two years, I should be recommended for a promotion to Senior Director.

Manager comments

Steve did a very good job executing various capital projects and providing facilities and offices when needed. A highlight was providing the new Kansas City office facility on-time and \$2.5 million under budget. Senior management in Kansas City was very pleased with the project. There have been no safety incidents year-to-date.

Employee Acknowledgement comments

Performance Notebook

Strengths

Strength

Has integrity, reliability and loyalty

Professional at the HARD services and have tactical management capabilities

Safety and QA are top priority

service-oriented, team player

Strong commitment to Teva, to US, to GFM and mainly to his staff

Understand the complexity of managing suppliers

Work well in a familiar environment

Exhibit "32"

STATEMENT

I, Kristin Macone, was employed by Teva for about four (4) years; I resigned my employment around August 2016. I reported to Steve Middlebrooks for approximately one (1) year. During that time, I had the responsibilities of a finance management position.

Steve was one of the top managers that I have ever had. He was extremely helpful, I thought that he was extremely knowledgeable and a very fair manager. I had zero complaints about him. I know from talking to Steve's other direct reports (including Troy Gaugler, John Eppley, and Ellen Cicak) that they felt the same way about him.

When I first interviewed for the finance position, I believe that Jessica Graybill in Human Resources warned me about working with Shimrit Shemtov and that she was very difficult to work with. I was told that the company would have me report to Steve rather than Shimrit so that I would not have to deal with Shimrit as much. During my interview with Shimrit (over Skype), she asked me my age, and whether I was married and whether I had children. I told Shimrit that I was uncomfortable answering those questions, and that I did not have to answer those questions. I was subsequently told by one of my references that Shimrit went to her and asked her the same questions about my age, whether I was married, and whether I had children.

My interactions with Shimrit after I was selected for the finance position in Steve's group were not pleasant. She screamed at me during our phone calls, emailed me at 2am (my time) and then would call me at 8am (my time) and ask me why I had not yet responded. My interactions with her were very upsetting. Steve did the best that he could to smooth the way to make things easier and to improve our interactions.

Based on my observations/interactions, it was clear to me that the Israeli team did not respect Steve's answers or approach to issues, that they did not give him an opportunity to give his opinions/recommendations (and were not interested in them), and that they were very disrespectful to him, mostly Nir Aharoni and Roni Kafre. I thought that their treatment of Steve was based on the fact that he was American; I got the impression that the Nir and Roni believed that the Americans lacked knowledge, that they were stupid, and that Nir and Roni (and the Israeli team) knew everything.

When I met with Leander Jones as part of the investigation, I told him that I felt that I was discriminated against based on my gender by Roni. No one got back to me regarding my complaints of gender discrimination. At some point later, I spoke with Tara Flagg in Human Resources and told her about Shimrit's questions to me during the interview regarding my age and my marital status, and whether I had children, and also that Roni treated me differently based on the fact that I was a woman. Tara did not get back to me regarding my complaints.

I ended up moving out of Steve's group, not at all because of him, but because of the situation with the Israeli team, and their treatment.

I understand that this statement is to be submitted in the lawsuit that Steve Middlebrooks has filed against Teva. I certify that the above statement is true and correct to the best of my information and belief.

4/6/18
Date

Kristin Macone
Kristin Macone